

Name: _____

**JUROR QUESTIONNAIRE
TO THE PROSPECTIVE JUROR:**

You have been summoned by this Court for jury service in a criminal case entitled United States v. Lev Parnas and Andrey Kukushkin. In this case, the Superseding Indictment charges both defendants with violating the federal election laws. Count One charges Parnas and Kukushkin with Conspiracy to Make Contributions by a Foreign National or to Make Contributions in the Name of Another, Count Two charges Parnas with Solicitation of a Contribution by a Foreign National. Count Three Charges Parnas and Kukushkin both with aiding and abetting the Making of a Contribution by a Foreign National. Count Four charges Parnas alone with Conspiracy to Make Contributions in the Name of Another. Counts Five and Six charge Parnas alone with Making False Statements to the Federal Election Commission and Falsification of Records, respectively. The charges are only allegations and not evidence. The defendants have entered pleas of not guilty to all of the charges in the case and each is presumed to be innocent. It will be the responsibility of the government, through the trial, to prove each of those charges as to each of the defendants beyond a reasonable doubt.

The integrity of our legal system depends on the fairness and impartiality of judges and jurors. As part of the jury selection process, each of you must complete this juror questionnaire. The questions on this form assist the Court and the attorneys in the jury selection process for this trial. This questionnaire is designed to obtain information about your background as it relates to your service as an unbiased, fair, and impartial juror in this case. The purpose of this questionnaire is not to ask unnecessarily about personal matters, but solely to assist the Court and the parties with gathering information helpful to securing a fair and impartial jury. The Court and the lawyers know that every person has beliefs and biases concerning many things. You should answer with your true feelings, whatever they may be. Do not assume that any of your answers will qualify you or disqualify you from serving on this jury.

Unless the question states otherwise, the fact that a particular question is asked does not imply that the subject matter of the question is an issue in this case. As you read the questions, you are not to draw any inferences about the issues that must be decided in this case. The

questions are not meant to invade your privacy but to help select a fair and impartial jury for this case.

If there is any reason why you might not be able to give both sides a fair trial in this case, it is important to say so. Please answer each question below as completely and as accurately as you reasonably can. Where indicated, please check the space for “yes” or “no” and, as requested, furnish answers clearly. Your complete honesty is essential. Do not leave any questions blank. If a question does not apply to you in any way, write “N/A” (for “not applicable”), rather than leaving the form blank. If you do not understand the question or do not know the answer, please write “I do not understand” or “I do not know the answer” in the space for the answer. If you feel the answer is too personal, please say so in the space provided. You will have the opportunity to discuss your answer privately. If you do not understand a question, need more space for your response, or wish to make further comments about any question, please use the extra sheets attached at the end of the questionnaire. If you use the explanation sheets, please make sure to indicate which numbered question you are answering.

You are instructed not to discuss this case or questionnaire with anyone, including your family or fellow jurors. It is also important that you do not engage in any research such as searching for stories or reports on the internet or social media about this case or anyone or anything to do with it. You must not read or listen to any media accounts whether in a newspaper, on the internet, on television, or on the radio. Do not discuss or post anything about this case on any electronic or social media, including Facebook, YouTube, Twitter, Reddit, Instagram, LinkedIn, Snapchat, TikTok, email, text message, any blog, website or chat forum or any other media of any kind. You must not let anyone, including friends and family, court personnel, parties or persons involved in the case talk to you about your views or any aspect of this case until the court has so instructed you to do so.

Your answers are confidential. It is important that you understand that the Court is sensitive to your privacy. They will be reviewed by the Judge and the lawyers in this case only. After a jury has been selected the original questionnaire will be returned to the Clerk of the Court and kept under seal and will only be disclosed, if at all, with names and other identifying information removed.

There are no right or wrong answers - only honest answers.

Upon completion, please sign your name on the last page where indicated. You are expected to sign your questionnaire, and your answers will be given the same effect as a statement given to the Court under oath.

Dated: New York, New York
October 12, 2021

Hon. J. Paul Oetken
United States District Judge

PRELIMINARY MATTERS

1. The trial in this case may last approximately three weeks, or even longer. The jury will generally sit ___ days per week (_____, _____, and _____), potentially from _____ am to _____ pm, during that time. Jury service is one of the highest duties and privileges of a citizen of the United States. Mere inconvenience or the usual financial hardship of jury service will be insufficient to excuse a prospective juror. Do you wish to apply to the Court to be excused on the ground that jury service would be a serious hardship?

☐ Yes ☐ No If Yes, please explain the hardship:

2. Do you have any condition or issue that would affect your ability to serve as a juror, including difficulty hearing, seeing, reading, or concentrating?

☐ Yes ☐ No If you feel you could serve with accommodations, please indicate the accommodations:

3. Have you been vaccinated against COVID-19 or are you scheduled to be vaccinated?

☐ Yes ☐ No 4. Have you already contracted COVID-19? ☐ Yes ☐ No

If Yes, are you fully recovered (no symptoms) and have you received a negative test result since recovering? ☐ Yes ☐ No

5. If called to serve as a juror, how concerned are you about getting sick with COVID-19?

6. If called to serve as a juror, how comfortable are you being in a large courtroom with 20-30 people?

7. Is there any reason relating to the COVID-19 pandemic that would make jury service an undue hardship for you or anyone in your household?

☐ Yes ☐ No If Yes, please explain:

7a. Because of COVID-19, do you feel you might be tempted to change your verdict to agree with others, or compromise with other jurors, in order to end deliberations faster so you could leave the courthouse sooner?

☐ Yes ☐ No

8. If called to serve as a juror, you will be required to wear a mask throughout the proceedings and throughout the courthouse. How comfortable are you wearing a mask?

☐ Yes ☐ No If No, please explain:

9. Do you think you will be able to wear a mask throughout the trial for several hours at a time?

☐ Yes ☐ No If No, please explain:

10. By what means will you be traveling to the Courthouse each day?

11. Do you have any concerns about traveling to the Courthouse each day to served on the jury?

☐ Yes ☐ No If No, please explain:

12. Is there anything else going on in your life or work that would prevent you from giving this case your full attention for the duration of trial?

☐ Yes ☐ No If Yes, please explain:

12a. Will your employer continue to pay your salary if you are selected to serve on this jury?

☐ Yes ☐ No ☐ Not Sure ☐ I do not have an employer

13. Do you have any difficulty reading or understanding English? ☐ Yes ☐ No

BACKGROUND

14. NAME: _____ Dr. Mr. Mrs. Ms. Miss Age: _____

15. Residence: County: _____ City/Town: _____ Neighborhood: _____

[Do not list your street address]

How long have you lived at that location? _____

Where did you live before residing at your current location? _____

Your place of birth: _____

Do you own or rent your home?

☐ Rent ☐ Own ☐ Neither (live with parents, friends)

What other communities have you lived in during the last ten years?

16. If called to serve as a juror, how will you commute to the courthouse?

17. What is your marital status?

☐ Single ☐ Married ☐ Separated ☐ Domestic partner
☐ Divorced, not remarried ☐ Divorced, now remarried
☐ Widowed, not remarried ☐ Widowed, now remarried

18. What is your current employment status?

☐ Working full-time ☐ Working part-time ☐ Work at home ☐ Retired ☐ Disabled
☐ Unemployed/Looking for work ☐ Homemaker ☐ Student ☐ Self-

employed Full-time student, please indicate areas of
study _____

Other, please describe _____

19. Occupation: [PLEASE NOTE: If you are currently not employed, retired, disabled or a homemaker, please describe your most recent prior employment]

a. What is your occupation (or what was it, if not currently employed)?

b. By whom are (were) you employed?

c. How long have (did) you worked there?

d. Please describe the nature/duties of your job.

e. Do (Did) you supervise other people? What are/were your supervisory responsibilities?

☐ Yes ☐ No If so, how many? _____

Responsibilities:

20. During your working life have you changed careers or occupations and, if so, please describe?

21. Have you ever had a job which was considered management? ☐ Yes ☐ No If Yes, describe that position with specifics of your role and how many people you managed?

21a. What is the highest level of education you completed?

22. Please describe your educational background:

<i>School Name</i>	<i>Major areas of study</i>	<i>Degrees received</i>
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23. Have you taken any courses or had training in law, legal procedure, or administration of justice?

☐ Yes ☐ No If Yes, please explain:

24. Please complete the following questions regarding your present spouse/partner. If you are widowed, divorced, or separated, please answer regarding your former spouse/partner.

Current employment status:

Working full-time Working part-time Retired Disabled

Unemployed Homemaker Full-time student

- a. What is his/her occupation (or what was it, if retired or unemployed or disabled)?
- b. By whom is (was) s/he employed? How long has (did) s/he worked there?
- c. Please describe the nature of his/her job, was it management or supervisory?
- d. What other types of jobs has s/he had in the past?

24a. What is the highest level of education s/he completed?

_____ Please describe her/his educational background,
including vocational school(s) and/or college(s) attended:

School Name Major areas of study Degrees received

24b. What are/were your parents 'and/or stepparents 'occupations? (If retired or deceased, what was their employment?)

Mother: _____ Father: _____

Stepmother: _____ Stepfather: _____

25. If you have children, please state:

Sex Age Education Occupation or Year in school

26. If other adults live in your home in addition to those you already described above, please state:

Relationship Sex Age Education Occupation

27. Have you or anyone close to you received any training, experience, or specialized knowledge or worked in any of the following fields? Please check the box that applies and provide an explanation below:

Sector	Yes, Me	Yes, Family Member	Yes, Someone Close to Me	No
Lobbying				
Political or Elected Office				
Political Action Committee				
Political Campaign or Campaigning				
Fundraising Political Fundraising Body or agency charged with overseeing election laws				
Investing				
Startups				
Private Equity				
Law				
Law Enforcement Finance/Economics				
Elections				

If you indicated Yes with a check mark to any of the above, please provide detail:

28. Have you or anyone close to you ever served in the military (including Reserves, National Guard or ROTC)?

☐ Yes ☐ No If Yes, please list the branch, years of service, rank attained, type of discharge, and whether you, your family member, or person close to you served in a military police unit, court martial, and/or were in combat:

29. What are you and your spouse's/partner's hobbies, major interests, recreational pastimes, and spare time activities?

29a. Name the one person (living or dead) who is likely known to all of us whom you admire over all others.

LIFE EXPERIENCE

30. a. Have you or anyone close to you ever been employed by, had training in, or have been affiliated with any law enforcement or other state or federal government agency (including but not limited to police, sheriff, corrections, parole or probation, the Federal Bureau of Investigation (FBI), Internal Revenue Service (IRS), Securities and Exchange Commission (SEC), Department of Homeland Security (DHS), Department of Health and Human Services (HHS), U.S. Postal Inspection Services, or any other state or federal regulatory law enforcement agency)?

☐ Yes ☐ No If Yes, please identify who, when, and describe the position(s):

b. Have you or anyone close to you ever worked for a court, prosecutor's office, or criminal defense office? This includes a judge, District Attorney's office, United States Attorney's office, State Attorney General, or any private or public criminal defense attorney's office?

☐ Yes ☐ No If Yes, please explain:

31. Have you or anyone close to you ever been the victim of any kind of crime – including domestic violence, burglary, robbery, assault, identity theft, fraud etc. – whether it was reported to law enforcement authorities or not?

☐ Yes ☐ No If Yes, please explain:

32. Have you ever called the police because of a crime or concern about illegal or dangerous activity? ☐ Yes ☐ No If Yes, please explain:

32a. Do you support the legalization of recreational marijuana?

☐ Yes ☐ No

32b. Do you have any feelings or opinions about the use of marijuana for medical purposes?

☐ Yes ☐ No If Yes, please explain:

32c. Have you ever been involved in any aspect of the legal Cannabis industry?

☐ Yes ☐ No If Yes, please explain:

MEDIA

How often do you use the internet?

☐ Every day ☐ A few times per week ☐ A few times per month

33. What are your main sources of news/current events? Please list those that fall into the categories below. If you need more space for any category or other answer, please use additional lines below.

Newspapers: _____

Social Media: _____

Television: _____

Radio: _____

Internet: _____

Conversations: _____

Other: _____

33a. Of the following, please indicate which sources you watch, read, or use? (check all that apply)

- ☐ ABC News
- ☐ Fox News
- ☐ Health Facts and Fears.com
- ☐ Health.com
- ☐ Huffington Post
- ☐ Mayo Clinic
- ☐ Medicine Net
- ☐ My House Call MD
- ☐ National Enquirer
- ☐ National Review
- ☐ NBC News
- ☐ NY Times
- ☐ OAN
- ☐ NewsMax
- ☐ CNN
- ☐ MSNBC
- ☐ OK Magazine
- ☐ People Magazine
- ☐ Radar Online
- ☐ BuzzFeed
- ☐ Star Magazine
- ☐ The American Spectator
- ☐ The Open Press
- ☐ The Weekly Standard
- ☐ Wall Street Journal
- ☐ WebMd
- ☐ Newsweek
- ☐ The Atlantic
- ☐ Other _____

34. Have you commented on, “liked,” posted or tweeted anything on social media about or relating to Lev Parnas, Andre Kukushkin, Igor Fruman, Global Energy Producers (GEP), Russia, Ukraine, Donald Trump, any election, political candidate or political committee?

☐ Yes ☐ No If Yes, please explain: _____

35. Do you read, listen to, follow, or subscribe to any of the following individuals on blogs, podcasts, social media, or in any other way? If Yes, please circle the applicable individuals: Sean Hannity, Rudy Giuliani, Steve Bannon, Charlie Kirk, OAN Networks, Newsmax, Fox, Laura Ingram, Tucker Carlson, Dan Bongino, Sarah Carter

36. Have you read, watched, listened to, or been told of any of the following (Please circle): Rachel Maddow interview, Lev Parnas; Anderson Cooper interview, Lev Parnas; Jonathan Capehart interview, Lev Parnas; and other media interview or story relating to Lev Parnas or Andrey Kukushkin?

If Yes, please explain: _____

36b. Have you read, watched, listened to, or been told of any book, story, magazine article, television program or documentary that touched on or talked about any of the defendants or this case? ☐ Yes ☐ No

If Yes, please explain, include where you saw any such item. Please explain:

37. Have you followed any recent criminal trial in the media or on television? ☐ Yes ☐ No

If **YES**, please list which ones: _____

38. Will anything you described above affect your ability to be fair and impartial to both sides in this case? ☐ Yes ☐ No Please explain:

FAMILIARITY WITH THE CASE

39. Do you know or have you heard about either defendant, Lev Parnas or Andrey Kukushkin?
☐ Yes ☐ No If Yes, please explain which of the defendants you have heard about, how you know that defendant, or what you have heard about him, and the source of anything you know or have heard about him:

40. Do you have familiarity with or have you heard about either Igor Fruman or David Correia this case?

☐ Yes ☐ No If Yes, please explain what you know/have heard and the source:

41. Have you or anyone close to you ever been employed by or applied to work at the Political Action Committee known as America First or Protect the House?

☐ Yes ☐ No If Yes, what were the positions and approximate dates of employment or application:

42. Have you or anyone close to you ever contributed to the Political Action Committees known as America First or Protect the House?

☐ Yes ☐ No If Yes, when and in what amounts:

43. Have you ever made a financial contribution to any political campaign or any political action committee?

☐ Yes ☐ No If yes, how frequently have you made political campaign contributions?

43a. Do you think money has too great an influence in politics?

☐ Yes ☐ No If Yes, please explain:

444. Have you or anyone close to you had any prior experience with Lev Parnas, Andrey Kukushkin, Igor Fruman or David Correia?

☐ Yes ☐ No If Yes, please explain:

45. Do you or to your knowledge do your friends or family members have strong opinions or feelings about either Mr. Parnas or Mr. Kukushkin, that would influence your ability to be a fair and impartial juror in this case?

☐ Yes ☐ No If Yes, please explain:

46. A list is attached to the end of this questionnaire. Please circle the name of any of the listed people that you personally know.

Please explain how you recognize or know the individual(s) whom you have circled:

EXPERIENCE WITH LEGAL SYSTEM

47. Have you previously served as a trial juror or as a grand juror? _Yes ___ No ___

If Yes, please complete for each case on which you served:

	Civil or Criminal	Nature of Case (e.g., personal injury, fraud)	When and Where?	Verdict Reached? (Yes or No only)
1				
2				
3				
4				
5				

a. Have you ever served as a jury foreperson? ☐ Yes ☐ No b. Is there any reason that your prior jury service would affect your ability to be fair, objective, and impartial to both sides

in this trial? ☐ Yes ☐ No If Yes, please explain:

48. Have you or anyone close to you ever had occasion to contact the United States Attorney's Office or the District Attorney's Office, including the Public Corruption, Consumer Fraud or Victim/Witness Divisions?

☐ Yes ☐ No If Yes, please explain:

49. Have you or anyone close to you ever had to appear or testify as a plaintiff, defendant, victim, or witness?

☐ Yes ☐ No If Yes, please explain:

50. Have you or anyone close to you ever been arrested? If you wish to speak privately with the court and attorneys please indicate.

☐ Yes ☐ No If Yes, please explain:

51. Have you or anyone close to you ever suffered a substantial monetary loss because of a financial investment, including stocks, real estate, or business?

☐ Yes ☐ No If Yes, please explain:

52. Have you ever reported someone for wrongdoing to your employer or a government agency?

☐ Yes ☐ No If Yes, please explain:

53. Have you or anyone close to you even been accused of fraud or of fraudulently concealing information?

☐ Yes ☐ No If Yes, please explain:

54. Is there anything about your experiences, opinions, or beliefs about race, color, immigration status, national origin, ethnicity, gender, or sexual orientation which would strongly influence your ability to judge the facts of a criminal case or the person accused?

☐ Yes ☐ No If Yes, please explain:

54a. Is there anything about your personal beliefs, whether religious, moral, ethical, or philosophical, that would prevent you from serving as a juror in a criminal case?

☐ Yes ☐ No If Yes, please explain:

55. If you are selected as a juror in this case, the court will instruct you on the applicable law and your duties as jurors. Will you be able to follow these instructions even if you disagree with them? ☐ Yes ☐ No Please explain:

56. In our justice system, every defendant is presumed innocent and must be acquitted unless the jury, unanimously and based solely on the evidence presented in court, decides that guilt has been proven beyond a reasonable doubt. Do you believe that simply because a person has been charged with a crime, that person:

Is Guilty ☐

Is Not Guilty ☐

Probably Is Guilty ☐

Don't Know ☐

Please explain:

56a. Do you feel that if a person is accused of a crime by the federal government, he or she is probably guilty of something?

☐ Yes ☐ No

57. In a criminal prosecution the government has the burden of proving guilt beyond a reasonable doubt. The defendant is presumed innocent; and therefore, has no burden to present any evidence. Do you believe that a defendant has an obligation to prove his/her innocence or produce any evidence in order to be found not guilty?

☐ Yes ☐ No If Yes, please explain:

58. Under the law, a defendant need not testify in his or her own defense. If a defendant does not testify, the jury may not consider that fact in any way in reaching a decision as to whether that person is guilty. Do you believe that a defendant must testify in order to be found not guilty?

☐ Yes ☐ No If Yes, please explain:

59. Have you or anyone close to you ever had a positive or negative experience with a law enforcement officer or agency, federal agency, or the federal government which would influence your ability to judge the facts of a criminal case or the person accused?

☐ Yes ☐ No Please explain:

60. During the trial, you may hear testimony from law enforcement officers. The judge will instruct you that the testimony of a witness should be given no more or less weight solely because the witness is a law enforcement officer. Despite that instruction, would you tend to give the testimony of a law enforcement officer any more or less weight than you would to the testimony of a witness who is not a law enforcement officer?

Less weight ____

Same weight ____

More weight ____

Please explain:

61. If you are selected to sit as a juror on this case, are you aware of any reason why you could not render a verdict based solely on the evidence presented at trial?

☐ Yes ☐ No If Yes, please explain:

62. As a juror it is important that you do not obtain information about this case outside of the courtroom. The Court will instruct you that: Because you will receive all the evidence and legal instruction you properly may consider to return a verdict: do not read, watch, or listen to any news or media accounts or commentary about the case or anything to do with it, do not do any research, such as consulting dictionaries, searching the Internet or using other reference materials; and do not make any investigation or in any other way try to learn about the case on your own. Do not visit or view any place discussed in this case, and do not use the Internet or any other resource to search for or view any place discussed during the trial. Also, do not do any research about this case, the law, or the people involved—including the parties, the witnesses or the lawyers—until you have been excused as jurors. If you happen to read or hear anything touching on this case in the media, turn away and report it to me as soon as possible. Will you be able to follow this instruction? ☐ Yes ☐ No Please explain:

63. Judge Oetken will preside over this trial. His courtroom deputy is Mr. Bruce Hampton. His Law Clerks are _____. Do you know Judge Oetken or any members of his staff?

☐ Yes ☐ No If Yes, please explain:

64. Is there anything about the subject matter of this case, or the points covered in this questionnaire, or any matter not covered by this questionnaire, which creates a question in your mind as to whether you can be a fair, objective, and impartial juror in this particular case?

☐ Yes ☐ No If Yes, please explain:

65. Is there any matter you wish to discuss privately with the Judge?

☐ Yes ☐ No If Yes, please

explain: _____

66. Is there anything else the attorneys or the Court might want to know about you when considering you as a juror in this case?

67. Did you have any problems reading or understanding this questionnaire?

☐ Yes ☐ No If Yes, please explain:

JUROR OATH

I declare under penalty of perjury that the answers set forth in this Jury Questionnaire are true and correct to the best of my knowledge and belief. I have not discussed the questions or my answers with others. I have not received assistance in completing this questionnaire.

Signature: _____

Print Name: _____

Date: _____

Further Explanation Sheet

(Please put the question number next to your response. Thank you)

This image shows a full page of white paper with horizontal blue ruling lines. The lines are evenly spaced and run across the width of the page, providing a template for writing or drawing. There are no margins, text, or other markings on the paper.

[illegible]

ATTACHMENT

Please check the name of any of the listed people that you personally know:

Attorneys

Prosecuting Attorneys:

- ☐ Nicolas Roos
- ☐ Aline Flodr
- ☐ Hagan Scotten
- ☐ Rebekah Donaleski

United States Attorney's Office, Southern District of New York

Defense Attorneys:

For Mr. Parnas:

- ☐ Joseph A. Bondy
- ☐ Stephanie R. Schuman

For Mr. Kukushkin:

- ☐ Gerald B. Lefcourt
- ☐ Faith Friedman

Possible Witnesses [To be Provided to Prospective Jurors]

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